

# Cooley

Aarti Reddy  
T: +1 415 693 2103  
areddy@cooley.com

Via CM/ECF

December 3, 2020

The Hon. Katharine H. Parker  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: Mahood et al. v. Noom, Case No. 20-cv-3677 (LGS) (KHP): Noom's Proposed RFP Chart Ordered by the Court and Response to Plaintiffs' Letter (ECF No. 115)**

Dear Judge Parker:

We write on behalf of Defendants Noom, Inc. and Artem Petakov ("Noom") to attach as Exhibit A the RFP chart ordered by the Court. (See ECF No. 94-2). Noom regrets that it was unable to prepare a joint filing with Plaintiffs, and notes that this chart is identical to the version filed concurrently by Plaintiffs, with one important exception: Noom's version includes a standalone list of each category of documents that Noom has agreed to produce. (Ex. A at 5-6). Noom sincerely believes that providing this information in a clear, synthesized format will be helpful to the Court, particularly given that the chart is over 100 pages.

Plaintiffs' counsel refused Noom's request to include in the chart the categories of documents Noom has already agreed to produce and did not provide any explanation for this refusal. Noom notes that this refusal serves no other purpose than to obscure the expansive materials Noom has already agreed to produce.

Sincerely,

/s/ Aarti Reddy

Aarti Reddy